

Message

From: Yezerski, Donald [Donald.Yezerski@wsp.com]
Sent: 8/23/2021 7:01:13 PM
To: Johnson, Ken-E [Johnson.Ken-E@epa.gov]
Subject: RE: Introduction & FOIA Request

Thanks, Ken.

Don Yezerski, P.G.
Office: 281-589-5833
Cell: 330-421-5372

From: Johnson, Ken-E <Johnson.Ken-E@epa.gov>
Sent: Friday, August 20, 2021 5:02 PM
To: Yezerski, Donald <Donald.Yezerski@wsp.com>
Cc: Dorsey, Nancy <Dorsey.Nancy@epa.gov>; Yun, Samuel <Yun.Samuel@epa.gov>; Friesenhahn, Brody <friesenhahn.brody@epa.gov>; Ussery, Ian <Ussery.Ian@epa.gov>; Feuer, Daniel <Feuer.Daniel@epa.gov>; McEvoy, Molly <mcevoy.molly@epa.gov>
Subject: RE: Introduction & FOIA Request

Don –

While there have been some earlier discussions about use of salt caverns for Class VI projects, I'm not aware of any CCS models that we've seen that show geo-mechanical behavior impact for cavern roof and wall structures. I note that several reservoir simulators can incorporate geo-mechanical features for reservoir rock but I not seen anything uniquely specific to cavern mining design.

In fact we've seen no models on CCS in storage caverns at all so far. LDNR has also previously indicated to us that salt caverns will not be allowed for Class VI in Louisiana. Additionally, we have talked with the RRC and EPA UIC HQ about the issue as well but are still awaiting additional feedback from RRC.

That is all the information I can provide at this point.

Ken Johnson, PE

Ground Water / UIC Section Chief,
Environmental Engineer, and
R6 Land Ban No Migration Petitions and Class VI Permits Coordinator

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UIC Webpages:

<http://www.epa.gov/uic/underground-injection-control-epa-region-6-ar-la-nm-ok-and-tx>

No Migration Petitions:

<http://www.epa.gov/uic/guidance-documents-completing-class-i-injection-well-no-migration-petitions>

Managing and Minimizing Potential of Injection-Induced Seismicity from Class II Disposal: Practical

Approaches: <http://www.epa.gov/uic/underground-injection-control-national-technical-workgroup-final-issue-papers>

Class VI Injection Wells:

<https://www.epa.gov/uic/federal-requirements-under-underground-injection-control-uic-program-carbon-dioxide-co2-geologic>

<https://www.epa.gov/uic/final-class-vi-guidance-documents>

Monitoring Injection Wells—Basic Hall integral Method:

https://www.iris.edu/hq/inclass/animation/monitoring_injection_wellsbasic_hall_integral_method

For Class VI applicants, EPA is a regulatory agency and not a research agency. We will not pass on any privileged or commercially valuable information. We will not suggest locations nor supply information. We will answer reasonable questions. It is up to the applicants to research, collect and model scenarios based on their own site-specific data and conditions to meet EPA regulatory standards. This does not prevent us from cautioning against certain locations which have been previously shown to be potentially unsuitable reservoirs through various investigations in other well class permitting actions. You will find many of your answers in the official Guidance documents on the EPA webpage.

From: Yezerksi, Donald <Donald.Yezerksi@wsp.com>

Sent: Friday, August 20, 2021 2:17 PM

To: Johnson, Ken-E <Johnson.Ken-E@epa.gov>

Cc: Garrett, Kaycee M. <Kaycee.Garrett@wsp.com>; Anderson, Eric <Anderson.Eric@epa.gov>

Subject: RE: Introduction & FOIA Request

Ken,

The FOIA process for GCS is complete. Thanks for your June note on the matter. On a different matter:

Are you aware of a Class VI permit/petition effort that aimed to sequester CO2 against a salt dome that contained active caverns and where the CCS model showed any effects on cavern stability or leakage into a cavern in any way?

I'm researching this particular question and I haven't found much information on the subject one way or another. If you have any insights, I would appreciate any thoughts you might have on the subject.

Thanks,

Don Yezerksi, P.G.

Office: 281-589-5833

Cell: 330-421-5372

From: Johnson, Ken-E <Johnson.Ken-E@epa.gov>

Sent: Tuesday, June 15, 2021 8:15 AM

To: Yezerksi, Donald <Donald.Yezerksi@wsp.com>; Moore, Graciela <Graciela.Moore@wsp.com>

Cc: Ussery, Ian <Ussery.Ian@epa.gov>; Dorsey, Nancy <Dorsey.Nancy@epa.gov>

Subject: RE: Introduction & FOIA Request

Don – As an FYI, much of the information for that particular project is covered under confidential business information which limits greatly what EPA discloses under a FOIA. Our section FOIA coordinator is Ian Ussery, who you can contact with any questions about the FOIA process.

Ken Johnson, PE

Ground Water / UIC Section Chief,
Environmental Engineer, and
R6 Land Ban No Migration Petitions and Class VI Permits Coordinator

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Class VI Injection Wells:

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<https://www.epa.gov/uic/final-class-vi-guidance-documents>

Monitoring Injection Wells—Basic Hall integral Method:

https://www.iris.edu/hq/inclass/animation/monitoring_injection_wellsbasic_hall_integral_method

From: Yezerski, Donald <Donald.Yezerski@wsp.com>

Sent: Monday, June 14, 2021 6:50 PM

To: Johnson, Ken-E <Johnson.Ken-E@epa.gov>; Dorsey, Nancy <Dorsey.Nancy@epa.gov>

Cc: Moore, Graciela <graciela.moore@wsp.com>

Subject: Introduction & FOIA Request

Hello Ken & Nancy,

My name is Don Yezerski, and I'm a recent hire at WSP working in the UIC group supervised by Graciela Moore. I understand that occasionally WSP reaches out to you both for assistance, so I'll take this opportunity to introduce myself and also make you aware that I filed a FOIA request today (EPA-2021-004919) seeking any documents that Gulf Coast Sequestration filed with the EPA as stated in their October 13, 2020 [press release](#). If there's anything else that you need from me to improve on that request, please let me know. I look forward to working with you both more in the future.

Sincerely,

Don Yezerski, P.G.
Senior Consultant - Geologist
Regulatory Geological Services



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